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VIA ECF

Hon. Jennifer E. Willis
United States Magistrate Judge
United States District Court
Southern District of New York
40 Foley Square, Room 425
New York, New York 10007

The request for a discovery conference is **GRANTED**. It will be held on **Thursday December 19, 2024 at 3:30PM in Courtroom 228** at the United States Courthouse located at 40 Foley Square, New York, NY 10007. Each party is to submit a letter detailing the outstanding issues at least one week before the conference. Each letter may not exceed 3 pages. SO ORDERED.


JENNIFER E. WILLIS

UNITED STATES MAGISTRATE JUDGE

November 22, 2024

**Re: *Onate v. AHRC Health Care, Inc.*
20-cv-08292-AS-JW**

Dear Judge Willis:

This firm represents the Defendant in the above-referenced action. The Defendant respectfully requests that Your Honor schedule a discovery conference to address the issues raised by the Defendant in the Parties' Status Report dated September 16, 2024. *See* ECF Doc. 244.

On May 23, 2024, the Parties had agreed that the 15 opt-in depositions were to occur within 60 days of receipt of all opt-in Plaintiffs' interrogatory responses. *See* ECF Doc. 231. On July 10, 2023, the Court ordered the Parties to submit a "letter updating the Court on the status of opt-in discovery." *See* ECF Doc. 232. The Court also ordered a discovery Conference on July 30, 2024. *See* ECF Doc. 232. On July 25, 2024, the Court ordered the Parties to "continue to engage in discovery." *See* ECF Doc. 236. On August 23, 2024, the Court ordered the Parties to file a letter to discuss whether a discovery conference is needed. *See* ECF Doc. 241. On August 26, 2024, the Parties asked for an adjournment of the conference because discovery was continuing. *See* ECF Doc. 242. The Court granted the adjournment and requested a status update on September 16, 2024, which is when the Defendant requested a discovery conference to address discovery issues that remain. *See* ECF Doc. 243-44.

The Defendant believes that a discovery conference is needed to address: (1) the timing of the 15 opt-in depositions given that the 56 opt-ins have not all yet served their interrogatory responses; (2) whether and the scope of class discovery that can proceed; and (3) the timing of expert discovery.

CLIFTON BUDD & DeMARIA, LLP

November 14, 2024

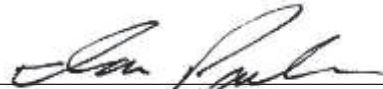
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The undersigned conferred with Plaintiffs' Counsel Jason S. Giaimo on Friday, November 8, 2024, and Plaintiffs' position remains the same as mentioned in the September Status Report. *See* ECF Doc. 244.

Respectfully submitted,

CLIFTON BUDD & DeMARIA, LLP
Attorneys for Defendant

By: _____



Ian-Paul A. Poulos

CC: All Counsel of Record